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Attorney for Defendant
JOSHUA DAVID PRICE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:24-cr-121-WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	CONTINUE STATUS CONFERENCE AND
)	EXCLUDE TIME
JOSHUA DAVID PRICE,)	
)	New Date: January 27, 2025
Defendant.)	Time: 10:00 a.m.
)	Judge: Hon. William B. Shubb
)	

IT IS HEREBY STIPULATED by and between the parties through their respective counsel, ROGER YANG, Assistant United States Attorney, attorney for Plaintiff, and RACHELLE BARBOUR, attorney for Defendant, JOSHUA DAVID PRICE, that the Status Conference set for Monday, October 28, 2024, at 10:00 a.m., be continued to Monday, January 27, 2025, at 10:00 a.m. and that time be excluded for the reasons set forth below.

Defense Counsel has received significant discovery that is subject to a protective order and must be reviewed personally with Mr. Price and cannot be left with him at the jail. Investigation is ongoing. Defense Counsel has been reviewing and analyzing the discovery, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case

1 with her client and the Government, and continue to prepare. The Government has indicated that
2 it may seek a superseding indictment regarding acts requiring significant additional discovery to
3 be provided to the Defense.

4 The parties believe that failure to grant the requested continuance would deny defense
5 counsel the reasonable time necessary for effective preparation, taking into account the exercise
6 of due diligence. Accordingly, the parties stipulate and request that the Court exclude time
7 between the date of the filing of this stipulation through the new status conference date of
8 January 27, 2025 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree
9 that the ends of justice served by continuing the case as requested outweigh the interest of the
10 public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

11 Dated: October 22, 2024

Respectfully submitted

12 HEATHER E. WILLIAMS
13 Federal Public Defender

14 /s/ Rachelle Barbour
15 RACHELLE BARBOUR
16 Assistant Federal Defender
Attorneys for Defendant
JOSHUA DAVID PRICE

17 Dated: October 22, 2024

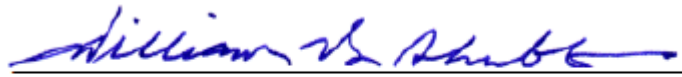
PHILLIP A. TALBERT
United States Attorney

19 /s/ Roger Yang
20 ROGER YANG
21 Assistant United States Attorney
Attorney for Plaintiff

22 **ORDER**

23 The Court hereby adopts the new Status Conference date and excludes time for the
24 reasons set forth above under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

25 Dated: October 28, 2024

26 
27 WILLIAM B. SHUBB
28 UNITED STATES DISTRICT JUDGE